

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CRISTINA FIERRO,

Plaintiff,

11 Civ. 8573 (BSJ)

-against-

LAWRENCE TAYLOR,

Defendant.

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PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law dated August 21, 2012, and the Declaration of Alexander Goldenberg dated August 21, 2012, with accompanying exhibits, Plaintiff Cristina Fierro, will move this Court, before the Honorable Barbara S. Jones, United States District Judge, at the United States Courthouse, 500 Pearl Street, Room 17C, New York, NY 10007, for an order precluding the dissemination of Ms. Fierro's grand jury testimony, or, in the alternative, precluding any use of the testimony at trial by Defendant, and granting such other and further relief as the Court deems just and proper.

Dated: New York, New York
August 21, 2012

CUTI HECKER WANG LLP

By: /s/ Mariann Meier Wang
Mariann Meier Wang
Alexander Goldenberg

305 Broadway, Suite 607
New York, New York 10007
(212) 620-2600

ALLRED MAROKO GOLDBERG
Gloria Allred
Nathan Goldberg
6300 Wilshire Boulevard, Suite 1500
Los Angeles, California 90048
(323) 653-6530

Attorneys for Plaintiff Cristina Fierro